

ROY P. EDWARDS )  
 )  
 Plaintiff, )  
 v. ) Civil Action File Number: 2017CV01486  
 )  
 SAM E. REYNOLDS )  
 and JOHN DOE )  
 )  
 Defendant. )

To: United States Environmental Protection Agency  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street SW  
Atlanta, GA 30303

HIPAA COMPLIANCE: This request is authorized pursuant to the Health Insurance Portability and Accountability Act, and the Privacy Regulations adopted thereunder in 45 CFR part 164, effective April 14, 2003. Under 45 CFR 164.512(e). Protected health information pursuant to this lawful discovery request may be disclosed, if (a) more than twenty (20) days has passed, and (b) no objections have been filed. Defendant has complied with notice requirements by sending a copy of this discovery request to the plaintiff's attorney.

As used herein, the term "document" shall mean the original of every writing or record of every type and description that is in your actual and/or constructive possession, custody, or control. The materials include without limitation, correspondence, memoranda, stenographic and handwritten notes, studies, publications, books, pamphlets, voice recordings, reports, minutes, electronic mails, electronic files, memoranda of agreement, diaries, calendars, invoices, bills, summaries, and medical records. The request includes every copy of such document whether or not the original is in your possession, custody, or control. Any document bearing on any side thereof any marks, such as (but not limited to) initials, stamped indicia, comments or notations, of any character and not a part of the original text or photographic reproduction thereof, is to be considered and produced as a separate document.

"Employee" shall mean Roy P. Edwards, DOB: 11/16/1957

The documents to be produced are:

- a) Documentation of employment, wages, salary, disciplinary action, termination or resignation, retirement benefits, pension benefits, and any and all other documentation of every kind and nature which in any way relates to the employee
- b) Your entire file on employee;

This 1st day of December, 2017.

SMITH MOORE LEATHERWOOD, LLP

By: /S/ David Lin  
David Lin  
Georgia Bar No. 482616  
Attorney for Defendant

Physical Address:  
Regions Plaza  
1180 West Peachtree Street NW, Suite 2300  
Atlanta, GA 30309-3482  
Direct: 404.962.1067  
[www.smithmoorelaw.com](http://www.smithmoorelaw.com)

Choice # 55560.011

**If copy costs exceed \$100 please contact Choice Legal, Inc. for approval**

Choice Legal, Inc.  
9204 King Palm Drive  
Tampa, FL 33619  
(813) 229-1444  
[records@choicelegal.com](mailto:records@choicelegal.com)

## ROY P. EDWARDS

V.

Defendant.

Civil Action File Number: 2017CV01486

This \_\_\_\_\_ day of \_\_\_\_\_, 2017.

Choice # 55560.011

**CERTIFICATE OF SERVICE**

This is to certify that I have this day served counsel for opposing parties in the foregoing matter with a copy of the attached pleading by depositing a copy of the same in the United States Mail in a properly addressed envelope with adequate postage thereon to ensure delivery to:

Randal E. Fry, Esq.  
The Fry Law Firm  
1401 Peachtree Street Northeast, Suite 500  
Atlanta, GA 30309

This 1st day of December, 2017.

By: /S/ David Lin  
David Lin  
Georgia Bar No. 482616  
Attorney for Defendant

Choice # 55560.011

## ROY P. EDWARDS

V.

Defendant.

Civil Action File Number: 2017CV01486

**DOB: 11/16/1957**

Order No. **55560.011**